

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2022 JAN 19 PM 4:59
OFFICE OF THE CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

AMY SHEPHERD and JOHNNY
BRADFORD II,

Defendants.

8:22CR 9

INDICTMENT
18 U.S.C. §§ 1343 & 2

The Grand Jury charges that

At all times material to this Indictment:

1. Roadrunner Temperature Controlled is the refrigerated trucking division of Roadrunner Transportation Systems and it is located in Sarpy County, Nebraska.
2. Defendant Amy Shepherd was employed by Roadrunner from July 25, 2016 through June 21, 2019. During her employment at Roadrunner, defendant, Amy Shepherd, was a Customer Service Manager, Driver Business Leader Manager, and, most recently, a Dispatch Lead Manager. Defendant Amy Shepherd was a Dispatch Lead Manager from October 13, 2018 to June 21, 2019. Defendant Amy Shepherd worked remotely from her home in Kansas.
3. Defendant Johnny Bradford II was a driver employed by Roadrunner from February 28, 2017 until May 4, 2018.
4. Roadrunner Temperature Controlled (hereinafter "Roadrunner") uses Electronic Funds Source (hereinafter "EFS"), an electronic wire transfer service, for their driver cash advances.

5. Roadrunner's driver cash advances typically occurred in the following manner: The driver cash advances were initiated by a driver contacting an employee in maintenance or dispatch to request fund advances. Fund advances were typically for truck or trailer repairs, cleaning/washing of a trailer, or to pay third-party workers to help load or unload the contents of a trailer. The maintenance or dispatch employee would authorize the cash advance information into Roadrunner's accounting system to generate a check code which would be communicated to EFS. The maintenance or dispatch employee would communicate to the driver the check code. The driver would have an EFS checkbook and would fill out a check with their name, the advance amount, and the check code. The driver would then take the check to a vendor establishment that cashes EFS checks. The vendor would contact EFS and inform EFS of the check code and amount. EFS would then locate the check code in their system and, if the balance associated with the check code is greater than or equal to the amount being requested, EFS would communicate an authorization code to the vendor. The vendor would then pay the driver the funds and the vendor would submit the check to EFS for reimbursement.

THE SCHEME AND ARTIFICE TO DEFRAUD

6. Beginning on or about February 1, 2018 and continuing through on or about June 21, 2019, defendant, Amy Shepherd, used her position with Roadrunner as a Dispatch Lead Manager to fraudulently generate advances and enter EFS check codes into Roadrunner's accounting system. Defendant, Amy Shepherd, characterized the advances as relating to legitimate business purposes, for example repairs, washouts, or trailer unloading. Defendant, Amy Shepherd, entered the advances for current Roadrunner drivers.

7. After generating the check code defendant, Amy Shepherd, sent the check code to defendant Johnny Bradford II. Defendant, Johnny Bradford II, filled out the EFS Checks with the check code he received from defendant Amy Shepherd. Defendant Johnny Bradford II then cashed the checks at vendor establishments.
8. After defendant Johnny Bradford II received the funds, he would use Western Union to send portions of the money he received from the fraudulent driver advances back to defendant Amy Shepherd.

USE OF INTERSTATE COMMUNICATION FACILITIES

9. Interstate wire communication facilities were used in furtherance of the scheme. Defendant Amy Shepherd in Kansas initiated an authorization for an advance of funds into Roadrunner's accounting system which was transmitted by means of wire communications to the District of Nebraska. Roadrunner's accounting system would then generate a check code which would be transmitted from the District of Nebraska to EFS which were then sent to the various establishments in Nevada where defendant Johnny Bradford II would receive the proceeds. Defendant Amy Shepherd would communicate the check code by means of wire communication from Kansas to defendant Johnny Bradford II in Nevada.

LOSS CAUSED BY THE FRAUD

10. As a result of the scheme and artifice to defraud, from on or about February 1, 2018 through on or about June 21, 2019, the defendants, Amy Shepherd and Johnny Bradford II, caused an actual loss of \$112,510.19.

COUNTS I – IV

11. For the purpose of executing the above described scheme and artifice to defraud and to obtain money by means of materially false and fraudulent pretenses, representations, and

promises as described in paragraphs 1 through 10 of this Indictment, the defendants, Amy Shepherd and Johnny Bradford II, in the District of Nebraska and elsewhere, did knowingly cause to be transmitted by means of wire communications in interstate commerce, certain writings, signs and signals for the purpose of executing the scheme and artifice to defraud, in that, the defendants, Amy Shepherd and Johnny Bradford II, did cause the transmission the electronic funds transfers described below, each of the below said wire communications constituting a separate count:

COUNT	DATE	WIRE COMMUNICATIONS
I	On or about February 2, 2018	Electronic Check numbered 115443711 in the amount of \$300 initiated by Defendant, Amy Shepherd, in Kansas purportedly as a "LUBE/SERVICE" through Roadrunner's accounting system in Nebraska to Defendant Johnny Bradford II in Nevada
II	On or about April 7, 2018	Electronic Check numbered 116060715 in the amount of \$300 initiated by Defendant, Amy Shepherd, in Kansas purportedly as being for "SVC/OIL/LUBE" through Roadrunner's accounting system in Nebraska to Defendant Johnny Bradford II in Nevada
III	On or about February 16, 2019	Electronic Check numbered 119673029 in the amount of \$300 initiated by Defendant, Amy Shepherd, in Kansas purportedly being for "Lights on tr 14368" through Roadrunner's accounting system in Nebraska to Defendant Johnny Bradford II in Nevada
IV	On or about June 9, 2019	Electronic Check numbered 121274968 in the amount of \$826.64 initiated by Defendant, Amy Shepherd, in Kansas purportedly being for "TRL16452 Alternator" through Roadrunner's accounting system in Nebraska to Defendant Johnny Bradford II in Nevada.

In violation of Title 18, United States Code, Sections 1343 and 2.

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

SEAN P. LYNCH, #25275
Assistant U.S. Attorney